

---

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WISCONSIN**

---

**In Re:**

**Case No. 09-14337**

**GREDE FOUNDRIES, INC.,**

**Chapter 11**

**Debtor**

**Hon. Robert D. Martin**

---

**RESPONSE OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS TO (i)  
MOTION FOR ORDER AUTHORIZING THE DEBTOR TO PROVIDE FINANCIAL  
SUPPORT TO VENDOR AND (ii) DEBTOR'S MOTION FOR EXPEDITED HEARING  
ON DEBTOR'S REQUEST FOR AUTHORIZATION TO PROVIDE FINANCIAL  
SUPPORT TO VENDOR**

---

The Official Committee of Unsecured Creditors of Grede Foundries, Inc. (the "Committee"), by and through its proposed counsel, DLA Piper LLP (US), hereby responds to the *Motion for Order Authorizing the Debtor to Provide Financial Support to Vendor* (the "Motion") and *Debtor's Motion for Expedited Hearing on Debtor's Request for Authorization to Provide Financial Support to Vendor* (the "Motion to Expedite"), and in support thereof respectfully states as follows:

**I.**  
**JURISDICTION**

1. The Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334.
2. Venue is proper in this district pursuant to 28 U.S.C. § 1409.
3. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(I).

## **II.** **BACKGROUND**

4. Grede Foundries, Inc. (the “Debtor”) commenced the above-referenced chapter 11 case (the “Chapter 11 Case”) by filing a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) on June 30, 2009 (the “Petition Date”).

5. The Debtor continues to operate its business and manage its properties as a debtor in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. To date, no request has been made for the appointment of a trustee or an examiner.

6. On July 8, 2009, the Office of the United States Trustee for the Western District of Wisconsin (the “US Trustee”) appointed the Committee, initially consisting of six members. On July 14, 2009, the US Trustee appointed a seventh member to the Committee.

## **III.** **RESPONSE**

7. By the Motion, the Debtor requests authority to use cash collateral to pay the approximately \$775,000.00 in Prepetition Receivables<sup>1</sup> owed to Vickers Engineering, Inc. (“Vickers”). By the Motion to Expedite, the Debtor requests that the Court hear the Motion on Monday July 27, 2009 at 9:15 a.m. CT. According to the Notice of Hearing on the Motion to Expedite, objections to the Motion must be filed before 12:00 noon CT on Friday July 24, 2009.

8. The Committee was formed only two weeks ago. Since its formation, the Committee has interviewed and selected legal counsel and a financial advisor and, along with its advisors, devoted substantial time and attention to the Debtor’s motions to approve customer accommodations agreements and a postpetition financing agreement.

9. The Committee is cognizant of the concerns expressed by the Debtor in the Motion. Before it can make an informed decision with respect to the Motion, however, the

Committee requires additional information about Vicker's financial condition, Vicker's loans with its secured lender, Bank of America (who, it should be noted, also is a member of the Debtor's senior lender group), and the Debtor's intentions with regards to providing financial support to other vendors that are situated similarly to Vickers.

10. For these reasons, the Committee requests an adjournment of the hearing on the Motion and an opportunity to object, if necessary, within a reasonable time before the continued hearing date.

Dated: July 23, 2009

Respectfully Submitted,

By: /s/ Timothy W. Brink

Timothy W. Brink (IL ARDC # 06215802)  
James R. Irving (IL ARDC # 6296799)  
DLA Piper LLP (US)  
203 North LaSalle Street, Suite 1900  
Chicago, Illinois 60601  
Telephone: (312) 368-6802  
Facsimile: (312) 251-2170  
Email: timothy.brink@dlapiper.com  
Email: jim.irving@dlapiper.com

-and-

Timothy W. Walsh (NY Bar # 2436152)  
DLA Piper LLP (US)  
1251 Avenue of the Americas  
New York, New York 10020-1104  
Telephone: (212) 335-4616  
Facsimile: (312) 884-8516  
Email: timothy.walsh@dlapiper.com

*Proposed Attorneys for the Official  
Committee of Unsecured Creditors*

---

<sup>1</sup> Capitalized terms used but not defined herein shall have the meaning given to them in the motion.